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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

DAVID S. OGBURN,

Plaintiff,

vs.

TRANS UNION LLC; and RUSHMORE
LOAN MANAGEMENT SERVICES,

Defendants.

Case No.: 2:19-cv-00580-JAD-GWF

**STIPULATION AND ORDER TO
EXTEND TIME FOR PLAINTIFF TO
RESPOND TO MOTION TO DISMISS**

[FIRST REQUEST]

Plaintiff David S. Ogburn ("Plaintiff"), by and through his counsel of record, and Defendant Trans Union LLC ("Trans Union") have agreed and stipulated to the following:

1. On April 5, 2019, Plaintiff filed a Complaint [ECF Dkt. 1].

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1 2. On May 20, 2019, Trans Union filed a Motion to Dismiss the Complaint [ECF
2 Dkt.14].

3 3. On June 3, 2019, Plaintiff filed an Amended Complaint [ECF Dkt. 16].

4 4. On June 17, 2019 Trans Union filed a Motion to Dismiss the Amended Complaint
5 [ECF Dkt. 19].

6 5. Plaintiff's Response is due July 1, 2019.

7 6. Plaintiff and Trans Union have agreed to extend Plaintiff's response ten days in
8 order to allow Plaintiff's counsel, who just made their first appearance on June 27, 2019 [ECF Dkt.
9 20], to allow counsel to engage in settlement negotiations, to review the matter and to contact the
10 clients to address Trans Union pending motion to dismiss and obtain approval to file the response.
11 should settlement negotiations prove unsuccessful. As a result, both Plaintiff and Trans Union
12 hereby request this Court to further extend the date for Plaintiff to respond to Trans Union's Motion
13 to Dismiss Amended Complaint until **July 11, 2019**. This stipulation is made in good faith, is not

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interposed for delay, and is not filed for an improper purpose.

IT IS SO STIPULATED.

Dated July 1, 2019.

KNEPPER & CLARK LLC

/s/ Matthew I. Knepper

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*Counsel for Defendant
Trans Union LLC*

**ORDER GRANTING STIPULATION TO EXTEND TIME
FOR PLAINTIFF TO RESPOND TO MOTION TO DISMISS**

IT IS SO ORDERED.


UNITED STATES DISTRICT JUDGE

Dated: July 2, 2019.